

EXHIBIT 1

COMMONWEALTH OF MASSACHUSETTS

Hampden, ss

Springfield District Court

C.A. No. 1423CV39

VERONICA A. WILSON,

Plaintiff,

Vs.

JUNIOR ANTHONY WILLIAMS and TAYVONTAE GOODMAN,

Defendants,

JUNIOR ANTHONY WILLIAMS

Defendant/Third-Party Plaintiff,

Vs.

KYLE A. WRIGHT,

Third-Party Defendant.

DEPOSITION OF: STEPHEN F. HIGGINS, III

Law Offices of John N. White

One Federal Street

Springfield, Massachusetts

November 13, 2014 12:12 p.m.

HUTCHINGS NUMBER: 534889-A

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1 **State Street, what took place; what happened?**

2 A. I was at the light, I was sitting at
3 the light; it was a red light.

4 **Q. And that light would be where?**

5 A. State and School. State and School or
6 State and Spring. I was sitting on the Spring
7 side. And I did observe the two guys on the bike,
8 coming up the hill. They weren't really moving at
9 a rate of speed, but -- they were horse-playing.

10 **Q. What do you mean by "horse-playing"?**

11 A. One of them was just horse-playing,
12 doing wheelies and just -- I don't know --
13 show-gunning.

14 **Q. Any idea, as you observed them, what**
15 **their speed was?**

16 A. Thirty; thirty-five, maybe.

17 **Q. I'm sorry. Can you continue on with**
18 **what you observed?**

19 A. The light turned green, and I went
20 through the light. And the guys, they were almost
21 at the intersection at this point; they weren't
22 quite. And I went -- I started going through and
23 I was watching them, because I have a bike, you
24 know, and I was watching them horseplay, and I'm
25 watching them go through the light, and I look in

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CERTIFICATE OF REPORTER

I, Jonathan P. Lodi, a Notary Public in and for the Commonwealth of Massachusetts, do hereby certify that STEPHEN F. HIGGINS, III came before me, on November 13, 2014, at The Law Offices of John N. White, One Federal Street, Springfield, Massachusetts, and was by me duly sworn to testify to the truth and nothing but the truth as to his knowledge touching and concerning the matters in controversy in this cause; that he was thereupon examined upon his oath and said examination reduced to writing by me; and that the statement is a true record of the testimony given by the witness, to the best of my knowledge and ability.

I further certify that I am not a relative or employee of counsel/attorney for any of the parties, nor a relative or employee of such parties, nor am I financially interested in the outcome of the action.

WITNESS MY HAND this 18th day of November, 2014.

Jonathan P. Lodi

Notary Public

My Commission Expires:

8/13/21